

Francesca A. Arcure  
Buckley Madole, P.C.  
99 Wood Avenue South, Suite 803  
Iselin, NJ 08830  
Telephone: (732) 902-5399  
NJ\_ECF\_Notices@BuckleyMadole.com  
Attorneys for Movant

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

In re:	Chapter 7
John M. Mavroudis,	Case No. 13-38118-MBK
	Hearing Date: 08/29/2016 @ 10:00 a.m.
Debtor.	Judge: Michael B. Kaplan

**NOTICE OF MOTION TO VACATE AUTOMATIC STAY  
ORAL ARGUMENT WAIVED**

TO: John M. Mavroudis  
690 Kinderkamack Rd., Ste. 300  
Oradell, NJ 07649  
Debtor

John M. Mavroudis  
# 2A 37A Sun Bowl Ridge Road  
Stratton, VT 05155

Michael D. Camarinos  
Camarinos Law Group, LLC  
411 Hackensack Avenue  
Suite 200  
Hackensack, NJ 07601  
Attorney for Debtor

Benjamin A. Stanziale, Jr.  
29 Northfield Avenue, Suite 201  
West Orange, New Jersey 07052  
Chapter 7 Trustee

United States Trustee  
Office of the United States Trustee  
One Newark Center  
Suite 2100  
Newark, NJ 07102

SIR/MADAM:

PLEASE TAKE NOTICE that on August 29, 2016 at 10:00 a.m., or as soon thereafter as counsel can be heard, the undersigned attorneys for Specialized Loan Servicing LLC, as servicing agent for The Bank of New York Mellon f/k/a The Bank of New York, as Trustee for CHL Mortgage Pass-Through Trust 2003-J8, Mortgage Pass-Through Certificates, Series 2003-J9 ("Movant"), will move before the United States Bankruptcy Court, Honorable Michael B. Kaplan, U.S.B.J., 50 Walnut Street, 3rd Floor, Newark, New Jersey, for an Order Vacating the Automatic Stay under 11 U.S.C. § 362(d) with respect to real property owned by John M. Mavroudis ("Debtor"), at # 2A 37A Sun Bowl Ridge Road, Stratton, VT 05155 (the "Property"), to allow Movant to pursue a mortgage foreclosure and/or other remedy under state law.

The motion is based on the inadequate protection of Movant's interest in the Property. Movant asserts that the facts and law it relies upon in making this motion are neither complicated nor unique, and therefore no brief or legal memorandum is necessary pursuant to D.N.J. LBR 9013-1.

Dated: August 3, 2016

Buckley Madole, P.C.

Attorneys for Specialized Loan Servicing LLC, as servicing agent for The Bank of New York Mellon f/k/a The Bank of New York, as Trustee for CHL Mortgage Pass-Through Trust 2003-J8, Mortgage Pass-Through Certificates, Series 2003-J9

By: /s/ Francesca A. Arcure  
Francesca A. Arcure

Specialized Loan Servicing LLC services the loan on the Property referenced in this Motion. In the event the automatic stay in this case is modified, this case dismisses, and/or the Debtor obtains a discharge and a foreclosure action is commenced on the mortgaged property, the foreclosure will be conducted in the name of Movant or Movant's successor or assignee. Movant, directly or through an agent, has possession of the Note. The Note is either made payable to Movant or has been duly endorsed. Movant is the original mortgagee or beneficiary or the assignee of the Mortgage/Deed of Trust.